

**UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF OREGON**

IN RE: Premera Blue Cross Customer Data  
 Security Breach Litigation

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Case No. 3:15-md-2633-SI

**[PROPOSED] CASE  
 SCHEDULING ORDER**

This Document Relates to All Actions.

Action/Event

- |                                                                                                                                                                                                   |                                            |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|
| 1. <b>Initial Case Management Conference</b><br>and appointment of interim class counsel and other<br>Plaintiffs' counsel leadership positions                                                    | August 7, 2015                             |
| 2. Deadline for parties to file proposed protective order(s)                                                                                                                                      | August 28, 2015                            |
| 3. Defendant to produce initial categories of documents as<br>agreed by the parties                                                                                                               | September 11, 2015                         |
| 4. Plaintiffs file Consolidated Master Complaint                                                                                                                                                  | October 6, 2015<br>(60 days after No.1)    |
| 5. Interim lead counsel and liaison plaintiffs' counsel file<br>leadership structure and responsibilities                                                                                         | October 6, 2015<br>(60 days after No.1)    |
| 6.. Parties confer about ADR                                                                                                                                                                      | November 13, 2015                          |
| 7. Defendant answers or otherwise responds                                                                                                                                                        | November 20, 2015<br>(45 days after No. 4) |
| 8. Deadline for parties' Rule 26(f) and LR 26-1 conference,<br>including ESI guidelines<br>Formal discovery may proceed                                                                           | December 4, 2015                           |
| 9. Parties file Rule 26(f) report<br><br>Deadline for parties to file proposed ESI protocol(s)<br>Deadline to establish document depository<br>Initial disclosures served or waived under LR 26-2 | December 18, 2015<br>(14 days after No. 6) |
| 10. Plaintiffs file response to motion to dismiss, if any                                                                                                                                         | December 30, 2015<br>(40 days after No. 7) |

11. Defendant files reply in support of any motion to dismiss January 29, 2016  
(30 days after No. 10)
12. Oral argument on motion to dismiss, if any February 24, 2016, 10AM  
**Second Case Management Conference**
13. Parties file Joint ADR Report under LR 16-4(d) April 17, 2016
14. Deadline to amend pleadings or join parties July 19, 2016
15. **Third Case Management Conference** August 2, 2016, 10AM
16. File motion for class certification October 12, 2016
17. File response to motion for class certification November 12, 2016
18. File reply in support of motion for class certification December 12, 2016
19. Oral argument on class certification motion January 12, 2017, 10AM  
**Fourth Case Management Conference**
20. Fact discovery closes March 17, 2017
21. Simultaneous exchange of expert reports April 17, 2017  
(Expert depositions to be scheduled by parties)
22. Simultaneous exchange of expert rebuttal reports May 17, 2017
23. Expert discovery closes June 16, 2017
24. **Fifth Case Management Conference** June 30, 2017, 10AM  
(Should limited fact or expert discovery be reopened?)
25. Deadline for filing dispositive motions September 1, 2017
26. File responses to dispositive motions September 29, 2017  
(28 days after No. 25)
27. File replies to dispositive motions October 27, 2017
28. Oral argument on dispositive motions November 17, 2017, 10AM  
**Sixth Case Management Conference**
29. First pretrial conference January 31, 2018, 10AM

30. Second pretrial conference February 9, 2018, 10AM
31. Trial commences February 26, 2018, 9AM  
(either class or non-class for bellwether case originally  
filed in District of Oregon)

Dated: 8/21/2015

Respectfully Submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on this day I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

*s/ Kim D. Stephens*

Kim D. Stephens